

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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October 24, 2024

**By ECF and Email**

Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Caleb Eccles-Gonsalves**  
**24 Cr. 391 (RMB)**

Dear Judge Berman,

I write to respectfully request that the Court adjourn the status conference in the above-captioned case, currently scheduled for Wednesday, October 31, at 9:00 a.m., for approximately 30 days. The parties are in the process of negotiating a potential pre-trial disposition of this matter. The requested adjournment will enable us to continue that process. Undersigned counsel is still in the process of reviewing the discovery produced by the government and I need additional time to discuss it with my client. In addition, the requested adjournment will enable the parties to discuss a potential pre-trial disposition of this matter.

The government, by Assistant United States Attorney Ashley Nicolas, consents to this application.

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the newly selected date.

Respectfully submitted,  
/s/  
Sylvie Levine  
Counsel for Caleb Eccles-Gonsalves

Application granted on consent.

The conference is rescheduled to December 11, 2024 at 9 AM.

Time is excluded under the Speedy Trial Act for the reasons set forth in the letter request.

**SO ORDERED:**

Date: 10/25/2024

  
Richard M. Berman, U.S.D.J.